

Amy Blalock  
1001 Gayley Ave #24381  
Los Angeles, CA 90024  
amyblalock@gmail.com

In Pro Se

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

In re:  
  
AMY LYNNE BLALOCK, an individual;  
  
Debtor,  
  
STEWART LUCAS MURREY, an individual;  
  
Plaintiff,  
  
AMY LYNNE BLALOCK, an individual;  
  
Debtor

Adversary Case No. 24-AP-01152-BR

Bankruptcy Case No. 24-bk-12532-BR

Chapter: 7

**DEFENDANT'S OPPOSITION TO PLAINTIFF  
DR. MURREY'S NOTICE  
AND MOTION TO COMPEL  
DEFENDANT MS. BLALOCK'S  
RESPONSES TO INTERROGATORIES,  
SET TWO, NO.S 22 & 23; REQUESTS  
FOR PRODUCTION OF DOCUMENTS,  
SET TWO; NO.S 41, 42 & 43; AND  
DISCLOSURES PER RULE  
26(A)(1)(A)(iii); REQUEST FOR  
MONETARY SANCTIONS AND ENTRY  
OF DEFAULT**

Hearing Date: January 7th, 2025

Hearing Time: 10:00am

Courtroom: 1668

Judge: Honorable Barry Russell

I. INTRODUCTION

Plaintiff, Stewart Lucas Murrey, an individual, is wasting court resources with his *second* Motion to Compel. Since November 21, 2024 the plaintiff has had all discovery; Interrogatories (Set One and Set Two), Requests for Admissions (Set One and Set Two) and (Demands for Inspection and Production of Documents (Set One and Set Two) responded to. When I received his Meet and Confer letter concerning a *second* Motion to Compel, I was confused why he was going to waste the court resources further when I already responded to the same requests he was asking for in the *first* Motion to Compel. I asked him to please advise and the plaintiff did not respond and instead moved forward with submitting a *second* Motion to Compel **SEE EXHIBIT A**. The hearing for the first Motion to Compel had already been set for December 17th, 2024, where the Honorable Barry Russell denied his motion.

II. FACTUAL BACKGROUND

Plaintiff's original emails on October 11, 2024 requested the following:

- Form Interrogatories (Set One) with 20 requests;
- Requests for Admissions (RFA) (Set One) with 19 separate requests;
- Demand for Inspection and Production of Documents (Set One) which included 40 requests for production;

Plaintiff sent a M&C letter on November 10th, 2024. Included with the plaintiff's M&C letter, he also sent:

- Form Interrogatories (Set Two) with Interrogatories 21-23
- RFA's (Set Two) with requests 20-22
- Demand for Inspection and Production of Documents (Set Two) which

1 included demands 41-44

2 I, the defendant, was able to complete all of his discovery requests and have them  
3 served on November 21, 2024 although plaintiff already set a hearing date for  
4 December 17th, 2024.

5 The Plaintiff then sent on December 5th, 2024:

6 - a second Meet and Confer Letter asking for these discovery requests and  
7 threatening a second motion to compel. In which I responded on December 8th,  
8 2024 with **EXHIBIT B** stating that I had already answered these in his first  
9 motion to compel and it would be a waste of court resources to file a second  
10 motion

11 Plaintiff then sent on December 11, 2024

12 -a response to my Opposition  
13 -a second motion to compel  
14 -a request for Judicial Notice which is irrelevant and goes against court  
15 procedures, furthering exhausting the judicial process

### 16 III. LEGAL ARGUMENT

17 1. THE COURT SHOULD DENY “Dr. Murrey’s Notice and Motion to Compel  
18 Defendant Ms. Blalock’s Responses to Interrogatories, SET TWO, No.s 22 &  
19 23; Requests for Production of Documents, Set Two; No.s 41, 42 & 44; and  
20 disclosures per rule 26(a)(1)(A)(iii); Request for monetary sanctions and entry  
21 of default”

1 I, the defendant pro se, made good faith efforts to resolve this before the  
2 plaintiff filed a Second Motion to Compel and have court intervention, as these  
3 discovery requests were already satisfied in the first Motion to Compel.

4  
5 IV. CONCLUSION


6 Due to the plaintiff's unwillingness to work with me to resolve the issue before  
7 getting the court involved again, the Court should deny the plaintiff's motion to compel  
8 and seek sanctions.

9 V. PRAYER FOR RELIEF

10 Defendant respectfully requests that this Court deny Plaintiff's Motion to Compel in its  
11 entirety. In support thereof, Defendant prays for the following relief:

- 12 1. That the Court find that the Motion to Compel lacks merit and is unwarranted under the  
13 circumstances;  
14 2. That the Court deny Plaintiff's request for the relief sought in the Motion to Compel;  
15 3. That Defendant be awarded reasonable fees and costs incurred in responding to this Motion, as  
16 deemed appropriate by the Court; and  
17 4. Such other and further relief as the Court deems just and proper.

18 Dated: December 17, 2024

19   
20 AMY BLALOCK, DEFENDANT  
21 IN PRO SE

Amy Blalock  
1001 Gayley Ave #24381  
Los Angeles, CA 90024  
amyblalock@gmail.com

In Pro Se

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

In re:

AMY LYNNE BLALOCK, an individual;

Debtor,

STEWART LUCAS MURREY, an individual;

Plaintiff,

AMY LYNNE BLALOCK, an individual;

Debt

Adversary Case No. 24-AP-01152-BR

Bankruptcy Case No. 24-bk-12532-BR

Chapter: 7

**DEFENDANT'S DECLARATION IN SUPPORT  
OF OPPOSITION TO PLAINTIFF DR.  
MURREY'S NOTICE  
AND MOTION TO COMPEL  
DEFENDANT MS. BLALOCK'S  
RESPONSES TO INTERROGATORIES,  
SET TWO, NO.S 22 & 23; REQUESTS  
FOR PRODUCTION OF DOCUMENTS,  
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**DEFENDANT’S DECLARATION IN SUPPORT OF OPPOSITION TO PLAINTIFF DR.  
MURREY’S NOTICE AND MOTION TO COMPEL DEFENDANT MS. BLALOCK’S  
RESPONSES TO INTERROGATORIES, SET TWO, NO.S 22 & 23; REQUESTS  
FOR PRODUCTION OF DOCUMENTS, SET TWO; NO.S 41, 42 & 43; AND DISCLOSURES  
PER RULE 26(A)(1)(A)(iii); REQUEST FOR MONETARY SANCTIONS AND ENTRY  
OF DEFAULT**

I, Amy Blalock, declares as follows:

1. I am the Defendant in this matter. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.
2. This declaration is in support of Opposition to Dr. Murrey’s Notice and Motion to Compel Defendant Ms. Blalock’s Responses to Interrogatories, SET TWO, No.s 22 & 23; Requests for Production of Documents, Set Two; No.s 41, 42 & 43; and disclosures per rule 26(a)(1)(A)(iii); Request for monetary sanctions and entry of default
3. Since November 21, 2024 the plaintiff has had all discovery; Interrogatories (Set One and Set Two), Requests for Admissions (Set One and Set Two) and (Demands for Inspection and Production of Documents (Set One and Set Two) responded to.
4. **Objections to the Discovery Requests**

The objections I put forth in all discovery requests are due to irrelevance in this case, privacy concerns and overbreadth. I stand by my original responses as listed below.

- **INTERROGATORY NO. 22:** “State the details concerning any and all monies you received from GoFundMe, including, but not limited to the amount you received, the individual from whom you received said monies, how the total amount of money received was dispersed and who dispersed said monies at what time.”

i. **DEFENDANT RESPONSE** : “Object. Not relevant to this case and this interrogatory seeks confidential information, which, if disclosed, may constitute an unwarranted invasion of privacy.”

- **INTERROGATORY NO. 23:** State and identify the complete name, address, telephone number, email address, social media accounts of any and all anonymous organizers and/or members of the GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>

i. **DEFENDANT’S RESPONSE** “Object. Not relevant to this case and this interrogatory seeks confidential information, which, if disclosed, may constitute an unwarranted invasion of privacy.”

- **DEMAND FOR PRODUCTION NO. 41:** Any and all receipts, documents, documentation, communications, emails, texts, and any and all other communications concerning the GoFundMe money that you received from the GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. **DEFENDANT’S RESPONSE:** The responding party is unable to comply with Request No. 41 because it is private financial information.

- **DEMAND FOR PRODUCTION NO. 42:** Any and all receipts, documents, documentation, communications, emails, texts, and any and all other communications with the anonymous organizer(s) and/or member(s) of the GoFundMe webpage from which you received money:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. **DEFENDANT'S RESPONSE:** The responding party is unable to comply with  
Request No. 41 because it is irrelevant to this case.

- o **DEMAND FOR PRODUCTION NO. 44:** Any and all messages, text messages,  
emails and/or communications concerning the removal of Elly Shariat's story of  
plaintiff stalking her on your GoFundMe webpage:  
<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.


i. **DEFENDANT'S RESPONSE:** The responding party is unable to comply with  
Request No. 44 because I never had aGoFundMe page and Elly Shariat is irrelevant to  
this case.

5. I made good faith efforts to resolve this without court intervention. SEE EXHIBIT A

6. For the reasons stated above, I respectfully request that the Court deny Stewart Lucas Murrey's  
Motion to Compel.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true  
and correct.

Executed on December 17th, 2024, in Los Angeles, CA

  
\_\_\_\_\_  
AMY BLALOCK, DEFENDANT

IN PRO SE



## EXHIBIT A

## Joint Stipulation for plaintiff's second motion to compel

Inbox x



te  
to me ▾

Mon, Dec 9, 8:37 PM (8 days ago)



Dear Ms. Blalock,  
please see attached joint stipulation for my second motion to compel, for your convenience in word.doc, thanks

-----  
Dr. Lucas Murrey  
Ph.D Yale University  
Author of Hölderlin's Dionysiac Poetry and Nietzsche: The Meaning of Earth  
SocialMedia: [sickoscoop.com/lucas](https://sickoscoop.com/lucas)  
Website: [lucasmurrey.com](https://lucasmurrey.com)

One attachment • Scanned by Gmail ⓘ



Amy B <[amyblalock@gmail.com](mailto:amyblalock@gmail.com)>  
to te ▾

Wed, Dec 11, 9:22 AM (6 days ago)



Mr. Murrey, I'm in receipt of this email. I work full time and have to find time to respond to all these requests. I'm a bit confused though, as I have already responded to this in my Opposition to Motion to Compel, which I sent to you last week. Please advise.

Signed,  
Amy Blalock

\*\*\*

← Reply

→ Forward



## EXHIBIT B

**Amy Blalock, Defendant, Pro Se**

1001 Gayley Ave #24381  
Los Angeles, CA 90046  
amyblalock@gmail.com

**Stewart Lucas Murrey, Plaintiff**

1217 Wilshire Blvd. # 3655  
Santa Monica, CA 90403

**December 7, 2024** (sent via email to servingpapers@protonmail.com and 2@lucasmurrey.io)

*Re:* Response to Second M&C letter titled: **Dr. Murrey v. Ms. Blalock; Adversary Case No.: 24-ap-01152-BR Failure of Defendant Ms. Blalock to Provide Complete and Thorough Responses to Plaintiff Dr. Murrey's Interrogatories, Set Two (2), No.s 22 and 23; and Requests for Production of Documents, Set Two (2), No.s 41, 42 and 44**

Dear Mr. Murrey,

I'm in receipt of your letter from December 6, 2024. I am not sure if you noticed but in my Declaration of Opposition to Motion to Compel, that I sent on Thursday December 5th at 10:10am, I provided this information to the court within my Opposition:

**1. Objections to the Discovery Requests**

The objections I put forth in all discovery requests are due to irrelevance in this case, privacy concerns and overbreadth. I stand by my original responses as listed below.

- INTERROGATORY NO. 22: "State the details concerning any and all monies you received from GoFundMe, including, but not limited to the amount you received, the individual from whom you received said monies, how the total amount of money received was dispersed and who dispersed said monies at what time."
  - i. DEFENDANT RESPONSE : "Object. Not relevant to this case and this

interrogatory seeks confidential information, which, if disclosed, may constitute an unwarranted invasion of privacy.”

- INTERROGATORY NO. 23: State and identify the complete name, address, telephone number, email address, social media accounts of any and all anonymous organizers and/or members of the GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>

i. DEFENDANT’S RESPONSE “Object. Not relevant to this case and this interrogatory seeks confidential information, which, if disclosed, may constitute an unwarranted invasion of privacy.”

- DEMAND FOR PRODUCTION NO. 41: Any and all receipts, documents, documentation, communications, emails, texts, and any and all other communications concerning the GoFundMe money that you received from the GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. DEFENDANT’S RESPONSE: The responding party is unable to comply with Request No. 41 because it is private financial information.

- DEMAND FOR PRODUCTION NO. 42: Any and all receipts, documents, documentation, communications, emails, texts, and any and all other communications with the anonymous organizer(s) and/or member(s) of the GoFundMe webpage from which you received money:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. DEFENDANT’S RESPONSE: The responding party is unable to comply with Request No. 41 because it is irrelevant to this case.

- DEMAND FOR PRODUCTION NO. 44: Any and all messages, text messages, emails and/or communications concerning the removal of Elly Shariat's story of plaintiff stalking her on your GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

- i. DEFENDANT'S RESPONSE: The responding party is unable to comply with Request No. 44 because I never had aGoFundMe page and Elly Shariat is irrelevant to this case.

//

I included those Demands for Production in my Declaration so that you would not have to waste further court resources by filing another Motion to Compel.

Signed,  
Amy Blalock